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Attorney for Defendant
CELIA ATKINSON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CELIA ATKINSON,

Defendant.

Case No. CR14-000167 CRB

**STIPULATION AND ~~[PROPOSED]~~ ORDER
CONTINUING STATUS CONFERENCE**

Defendant CELIA ATKINSON, by her counsel David W. Shapiro, and the United States Attorney, by its counsel Special Assistant U.S. Attorney Katherine Lloyd-Lovett, hereby stipulate and agree that a status conference be set for December 23, 2015, at 2:00 p.m., or as soon thereafter as may be convenient to the Court.

The grounds for this stipulation are as follows:

1. This case is currently scheduled for a status conference on December 16, 2015.
2. The defense and the government have discussed a disposition of diversion for Ms. Atkinson. The Pretrial Services office is currently conducting an investigation to determine its position regarding diversion. The officer estimates that the investigation will be completed in about the next week.
3. The parties have agreed that a continuance to December 23, 2015 is reasonable, and the Court is available on that date.

1 4. The parties request that the Court exclude time between December 16, 2015 and
2 December 23, 2015 from the calculation of time under the Speedy Trial Act, 18 U.S.C. § 3161, to
3 allow for the effective preparation of counsel for possible diversion. The parties agree that the ends
4 of justice in granting the continuance and excluding time outweigh the best interest of the public and
5 the defendant in a speedy trial.

6 5. Special AUSA Katherine Lloyd-Lovett has consented to the continuance and to the
7 exclusion of time under the Speedy Trial Act, and to the inclusion of her signature on this stipulation.
8

9 Dated: December 9, 2015

/s/ David W. Shapiro
DAVID W. SHAPIRO
Attorney for Defendant Celia Atkinson

/s/ Katherine Lloyd-Lovett
KATHERINE LLOYD-LOVETT
Special Assistant U.S. Attorney

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~~PROPOSED~~ ORDER CONTINUING
STATUS CONFERENCE

Based on the stipulation between the parties in this case, IT IS ORDERED that a status conference in this case is set for December 23, 2015 at 2:00 p.m.

IT IS FURTHER ORDERED that the time period between December 16, 2015 and December 23, 2015 is excluded in computing the time within which the trial must commence, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(i) and (iv).

IT IS SO ORDERED:

Dated: December 10, 2015



HONORABLE CHARLES R. BREYER
United States Senior District Judge

ORDER CONTINUING STATUS
CONFERENCE
Case No.: CR14-000167 CRB